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## BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268

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Docket No. MC98-1

## PITNEY BOWES' NOTICE OF INTENT TO CONDUCT ORAL CROSS-EXAMINATION

Pitney Bowes Inc. gives notice of its intention to conduct oral cross-examination on the following USPS witnesses in the subject areas indicated:

WITNESS STIREWALT (USPS-T3) will be examined on his responses to the interrogatories designated by Pitney Bowes as its written cross-examination of him.

WITNESS SECKAR (USPS-T2) will be examined on certain aspects of Tables 4, 14 and 15 in Exhibit A to his testimony.

WITNESS PLUNKETT (USPS-T5) will be examined on the "revenue leakage" phenomenon to which he testifies, particularly as illustrated in Exhibit D to his testimony, his responses to the interrogatories designated by Pitney Bowes as its written cross-examination of him and his testimony concerning appropriate coverage levels for the MOL service.

WITNESS ROTHSCHILD (USPS-T4) will be examined concerning her responses to the interrogatories designated by Pitney Bowes as its written cross-examination of her and material contained in a cross-examination exhibit served today on her counsel.

WITNESS GARVEY (USPS-T1) will be examined on his responses to the interrogatories designated by Pitney Bowes as its written cross-examination of him.

Respectfully submitted,

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Counsel to Pitney Bowes Inc.

DC1:83567

## **CERTIFICATE OF SERVICE**

I hereby certify that I have on this date served this document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

DATE: November 16, 1998

N. Frank Wiggins